

JAMES KOUSOUROS
ATTORNEY AT LAW

JAMES KOUSOUROS
FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016
212•532•1934 / 212•532•1939 fax
E-mail: James@kousouroslaw.com

EMMA J. COLE
LEGAL ASSISTANT

November 29, 2020

BY ECF

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Jose Cespedes, 20 Cr. 369 (LGS)

Dear Judge Schofield,

This letter is to respectfully request one final two-week adjournment for motions to be filed in this case. As we have previously set forth, the discovery in this case is voluminous as it involves several warrants, including an eavesdropping warrant and a lengthy post arrest interview of my client. We have been diligently reviewing this discovery while discussing a disposition with the Government. Our discussions have been fruitful and we believe will resolve the matter, however, they have included certain fact specific issues which required not only a review of the warrants and affidavits but more importantly the fruits thereof. There are a multitude of conversations, texts and other materials from which these facts have been gleaned. We have hopefully resolved the final adjustment and again we believe the matter will be resolved shortly. Accordingly, we request this additional time in the hope that we can avoid additional litigation and not jeopardize our negotiations. I assure this Court again that this has been a time-consuming task and that we have been working diligently to resolve the outstanding issues relating to a disposition.

We have consulted with the Government and there is no objection to this request. We consent to the exclusion of this time from speedy trial calculations as it constitutes continued motion practice, and we require this additional time to review the discovery and discuss a disposition with the Government.

Application Granted. Defendants' motion(s), if any, shall be filed by **December 18, 2020**. The Government's response shall be filed by **January 5, 2021**. Defendants' reply shall be filed by **January 15, 2021**. All other dates shall remain unchanged. The Clerk of the Court is directed to terminate the letter motions at docket number 43.

Dated: December 2, 2020
New York, New York

Respectfully Submitted,

/s/ _____

James Kousouros, Esq.
c.c.
Peter Davis
Assistant United States Attorney


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE